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7 UNITED STATES DISTRICT COURT  
8 DISTRICT OF NEVADA

9 UNION PACIFIC RAILROAD COMPANY, a  
10 Delaware corporation,

11 Plaintiff,  
vs.

12 DIAMOND PLASTICS CORPORATION, a  
13 Delaware corporation, and DOES 1-10,  
inclusive

14 Defendant.  
15

Case No.: 3:23-CV-00110-MMD-CSD

**STIPULATION AND [PROPOSED]**  
**ORDER EXTENDING PLAINTIFF**  
**UNION PACIFIC RAILROAD**  
**COMPANY'S DEADLINE TO OPPOSE**  
**DEFENDANT'S MOTION TO DISMISS**  
**AND MOTION FOR STAY**

(First Request)

17 Plaintiff Union Pacific Railroad Company (“Union Pacific”) and Defendant Diamond  
18 Plastics Corporation (“Diamond Plastics,” together with Union Pacific, the “Parties”) by and  
19 through their attorneys of record have met and conferred regarding the deadline for Union Pacific  
20 to respond to Diamond Plastics’ Motion to Dismiss and Motion for Stay (ECF No. 11). The Parties  
21 previously agreed to a brief extension between themselves. Now the Parties plan to engage in  
22 settlement discussions, so seek leave from the Court for an additional extension of Union Pacific’s  
23 time to oppose Diamond Plastic’s motion until May 19, 2023.  
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1           The forgoing request is made in good faith and not for purposes of delay.  
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3           Dated this 19<sup>th</sup> day of April, 2023.

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5           PARSONS BEHLE & LATIMER

SMITH, JOHNSON, ALLEN, CONNICK &  
HANSEN

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*/s/ Sarah Ferguson*  
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*/s/ Jared J. Krejci*  
17          Jared J. Krejci, Esq.  
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34          *Local Counsel for Defendant*

35  
36          IT IS SO ORDERED.



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38          UNITED STATES DISTRICT COURT JUDGE

39          DATED: April 20, 2023